

### **REMARKS/ARGUMENTS**

This case has been carefully reviewed and analyzed in view of the Office Action dated 16 April 2008. Responsive to that Office Action, Claim 12 is canceled without prejudice or disclaimer; and, Claims 8, 15, 18, 19, and 21 are amended. In addition, Claims 25-26 are newly-inserted for further prosecution with the other pending Claims. It is believed that with such amendment of Claims, there is a further clarification of their recitations.

In the Office Action, the Examiner rejected Claims 8-16 and 19-24 under 35 U.S.C. §102(b) as being anticipated by the Schuman, et al. reference. The Examiner further rejected Claim 18 under 35 U.S.C. §103(a) as being unpatentable over Schuman, et al. In setting forth the latter rejection, the Examiner acknowledged that Schuman, et al. fails to expressly disclose an ultrasound apparatus having a network interface unit connected to an image capturing unit, and operable in the manner claimed. The Examiner, however, reasoned such to be implicitly taught in Schuman, et al.'s other disclosures and concluded therefrom that it would have been obvious to one of ordinary skill in the art to have accordingly modified the Schuman, et al. method.

As each of the newly-amended independent Claims 8, 15, and 21 now more clearly recite, Applicant's method and device include among their combinations of features establishing measures by which one or more "non-radiological medical apparatus[es]" for generating medical image signals may be conveniently accessed

for remote actuation. As the Claims further clarify, even a non-radiological medical apparatus whose image signals are otherwise “incompatible with DICOM format” may be “selectively actuat[ed]” by a remote device to “control[]” the capture, storage, and transmission of the apparatus’ image data in the manner claimed.

The full combinations of these and other features now more clearly recited by Applicant’s pending Claims is nowhere disclosed by the cited reference. While Schuman, et al. does disclose the conversion of examination data from an ultrasound system 100 to a format readable by certain portable computing devices, the focus of that reference is the readable transfer of the existing examination data. Nowhere does Schuman, et al. disclose its personal computing devices (in the form of a PDA 150 or review workstation 300) to in any actuate the ultrasound system’s operation in capturing, storing, and transmitting image data. Schuman, et al.’s PDA or review station nowhere exercises any control over the ultrasound system itself; hence, the reference could hardly be said to “selectively actuat[e]” its capture, storage, and transmission of image data, as now more clearly recited by Applicant’s newly-amended independent Claims.

Indeed, as Schuman, et al. specifically notes, “it is preferred that the image formatting occur at” none other than “the ultrasound system” itself (column 7; lines 9-10). Reluctant as it is to leave even just the data formatting/conversion capability with a computing device outside the ultrasound system itself, the

reference teaches away from leaving even more capabilities - such as selectively actuating any part of the ultrasound system's operation to capture, store, and/or transmit image data – with such computing device.

The Shuman specification does disclose that “the ultrasound system can convert the format of the data from a form readable by the personal digital assistant or the review station ...” (column 6, lines 65-68). The data format may be JPG, other suitable industry standard format or DICOM standard. However, it does not disclose “analog signal to digital signal” conversion action. To the contrary, the ultrasound system of the Schuman is capable of generating digital image itself, so it is not necessary to execute a image digitizing action.

The present invention specification does disclose “analog signal to digital signal” measures, such as a digital conversion device 20 connected to the old-type medical apparatus 11. The digital conversion device 20 is mainly used “to convert the medical image into digital image data...” (paragraph 2, detailed description of the embodiments), and “[t]hrough the function of the digital conversion device 20, the old-type medical apparatus 11, like the new-type medical apparatus 10, can generate digital image data conforming to the DICOM specification.” (paragraph 6, detailed description of the embodiments).

Therefore, Schuman, et al. does not disclose “a non-radiological medical apparatus incompatible with the DICOM format used for capturing images of the inside of a human body and generating medical image signals,” recited in Claim 8.

A device formed in accordance with the present invention can integrate different kinds of medical apparatus, different manufactures' medical apparatus (background of the invention), and different types of medical apparatus (claim 25). Further, it integrates old-type medical apparatus. For example, the digital conversion device 20 is connected to the old-type medical apparatus 11 (paragraph 2, detailed description of the embodiments) and "[T]hrough the function of the digital conversion device 20, the old-type medical apparatus 11, like the new-type medical apparatus 10, can generate digital image data conforming to the DICOM specification" (paragraph 6, detailed description of the embodiments). "The old-type medical apparatus 11 cannot directly accept the DICOM control command sets. It is necessary to generate digital image data and store them in the digital conversion device." Therefore, the old-type medical apparatus would otherwise have difficulty managing DICOM control command sets, as there is significant incompatibility between such old-type medical apparatus and a new-type medical apparatus. The present invention serves to integrate such an old-type medical apparatus, despite the fact that image data generated by these different kinds of medical apparatuses are enormous and do not have the same image data properties. Schuman, et al. does not disclose measures for addressing this problem.

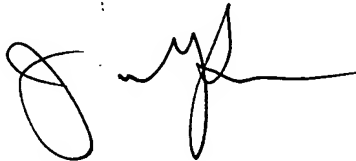
It is respectfully submitted, therefore, that the Schuman, et al. reference, even when considered in combination with other cited references, fails to disclose

the unique combinations of features now more clearly recited by Applicant's pending Claims for the purposes and objectives disclosed in the subject Patent Application.

It is now believed that the subject Patent Application has been placed in condition for allowance, and such action is respectfully requested.

If there are any further charges associated with this filing, the Honorable Commissioner for Patents is hereby authorized to charge Deposit Account #18-2011 for such charges.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Jun Y. Lee', with a stylized, cursive script.

Jun Y. Lee  
Registration #40,262

Dated: 9/11/2008

Suite 101  
3458 Ellicott Center Drive  
Ellicott City, MD 21043  
(410) 465-6678  
Customer No. 04586